

## Remarks

The present response is to the Office Action mailed in the above-referenced case on March 21, 2003. Claims 1, 4-7, 10-13, 15 and 18 are pending for examination. The Examiner has rejected claims 1, 4-7, 10-13, 15 and 18 under 35 U.S.C. 103(a) as being unpatentable over Iwami et al. (U.S. 5,604,737), hereinafter Iwami, in view of Chang et al. (U.S. 6,198,738), hereinafter Chang.

Applicant has again reviewed the reference of Iwami, and has carefully studied the new reference of Chang, and the Examiner's rejections and statements in the instant Office Action. In response, applicant provides argument to more particularly point out and distinctly claim the subject matter of applicant's invention regarded as patentable, and to distinguish clearly and unarguably over prior art presented by the Examiner. Applicant points out and argues the key limitations of applicant's claims which appeared to be misunderstood by the Examiner.

Regarding claims 1, 7, 13 and 18, the Examiner states that Iwami discloses a bridge unit and method comprising substantially limitations of applicant's claims, including a look-up table relating COST telephone numbers to IP addresses wherein a control routine functions to extract specific data to access the look-up table (Fig. 18, col. 15, lines 41-55 the extension and/or the terminal address has to be extracted in order to be compared), but that Iwami does not specifically disclose that the LAN network includes the Internet. The Examiner adds that Iwami discloses that the communication terminal could be using various Internet protocols.

The Examiner relies on Chang for teaching that the network could be the Internet, and it would have been obvious to include the Internet and allow to transmit voice communication to travel through the Internet as taught by Chang, with the method and system of Iwami in order to communicate with the greatest number of possible users, the motivation being a desire to use the network that is most broadly available and therefore preferred.

Regarding claim 4 and 10, the Examiner states that Iwami discloses that specific data is coded in an IP address (Fig. 18, the IP address correlates to the telephone number). For convenience, applicant reproduces claim 1 below.

Applicant's claim 1 recites:

1. *(Previously Amended) A computerized telephony bridge unit, comprising:  
a trunk-line port and associated circuitry for receiving and placing Connection  
Oriented/Switched Telephony (COST) telephone calls on a COST network;  
a data network port and associated circuitry for receiving and placing Internet  
Protocol Telephony Network (IPNT) calls on the Internet;  
conversion circuitry for converting data representing calls dynamically between  
IPNT and COST telephone calls and  
a digitally-stored look-up table relating COST telephone numbers to IP  
addresses;  
characterized in that control routines functioning as part of the bridge unit  
receive a first incoming call from one of the COST and Internet networks, extract specific  
data encoded into the incoming call, either COST or IPNT, and use the extracted data to  
access the look-up table to determine an associated COST telephone number or IP  
address, and use the associated COST telephone number or IP address to place a call  
associated with the received call on the network other than the network on which the call  
is received, and dynamically convert data between the associated calls, and the dynamic  
conversion of data enables two people to engage in a live conversation even though one  
person is on the Internet and the other is on a COST network.*

Applicant's claim specifically recites "control routines functioning as part of the bridge unit receive a first incoming call from one of the COST and Internet networks, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address". Applicant's claim 4 specifically recites that the specific data extracted from the incoming call is coded in a portion of an IP address associated with the incoming call.

The Examiner stated that Iwami teaches control routines functioning to extract specific data to access the look-up table. Applicant argues, however, that using the

COST or IP address of the incoming call in order to compare it with associated IP addresses or COST telephone numbers clearly cannot read on extracting specific data encoded into the incoming call either COST or IPNT, and using the extracted data to access the look-up table to determine an associated COST number or IP address. Fig. 18 of Iwami simply illustrates the structure of an extension number management table, which stores COST extension numbers and associated communication terminal (IP) addresses. Iwami teaches, with reference to Fig. 17, processing for determining a communication terminal with which a telephone user wishes to communicate, wherein an extension number is entered by a caller (source of incoming call to be converted) through push buttons of a telephone. The resulting corresponding tone is converted to a numeral and stored, and upon determination of the termination of entering the extension number, the communication terminal address (IP address) of a communication terminal having the inputted extension number is found from an extension number management table (Fig. 18), to determine the address of a communication terminal with which the telephone user desires to communicate. In this example, it is clearly shown that Iwami teaches simply a process wherein, for an incoming COST call, the extension number entered by the caller is used for the incoming call to compare with associated IP addresses in the management table. Iwami, however, nowhere deals with processing an incoming Internet call, and extracting specific information encoded into the Internet call for accessing a look-up table and determining the associated cost telephone number. Iwami does not teach or suggest this capability at all, and deals only what incoming COST calls. The Examiner stated that the Iwami reference shows that specific data of an incoming call is coded in a portion of an IP address associated with the incoming call. Applicant respectfully disagrees with the Examiner. Iwami nowhere teaches or deals with any encoding of any data into an IP address associated with an incoming Internet call, Iwami simply uses an extracted extension number associated with an incoming COST call to compare with IP addresses stored in a management table for determining the communication terminal with which the caller wishes to communicate. There is simply no manipulation or encoding of any data in the Internet addresses, as taught in applicant's invention, and specified in applicant's claims.

Applicant's invention teaches that control routines receive a first incoming call and extract specific data encoded into the incoming call, regardless of whether the incoming call is a COST call or Internet call. Applicant's claim 1 specifically recites that control routines receive a first incoming call from one of the COST and Internet networks, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address". In the case of an incoming Internet call, a COST telephone number may be encoded by an agent in the call center into an IP address of the computerized bridge, and the bridge has control routines which extract that COST number from the IP address or other header in an incoming IP call from the call center. The coded portion of the IP address may also have just a key instead of the entire cost number, and the key may allow look-up in a stored table at the bridge to ascertain the cost number to which the call may be connected and translated. Applicant believes that encoding and extracting such specific information from an incoming call, whether the call be a COST call or an IPNT call, for the purpose of using the extracted information to access a look-up table to determine a destination number or IP address for placing a second call related to the first incoming call, is a key and patentable distinction over the prior art.

Regarding claims 4 and 10 the Examiner stated that Iwami discloses that specific data is coded in an IP address (i.e. Fig. 18, the IP address correlates to the telephone number). As argued above, applicant reasserts that Iwami does not teach or suggest encoding data into an IP address associated with an incoming Internet call; rather, Iwami simply compares an extracted extension number associated with an incoming COST call and uses it to compare with associated Internet addresses stored in the management table.

Applicant believes, therefore, that the combined art clearly and unarguably fails to specifically teach, suggest or have motivation for all of the limitations of applicant's independent claims 1, 7, 13 and 18. Claims 4-6, 10-12 and 15 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims have been shown to be patentable over the prior art, applicant respectfully requests that the rejections be withdrawn, and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully,  
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by



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